

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

ANKER INNOVATIONS TECHNOLOGY  
CO., LTD.,

Case No. 2:25-cv-00379

Plaintiff,

v.

AMERICA UGREEN LIMITED, UGREEN  
IMPORT & EXPORT CO., LTD., AND  
UGREEN GROUP LIMITED,

Defendants.

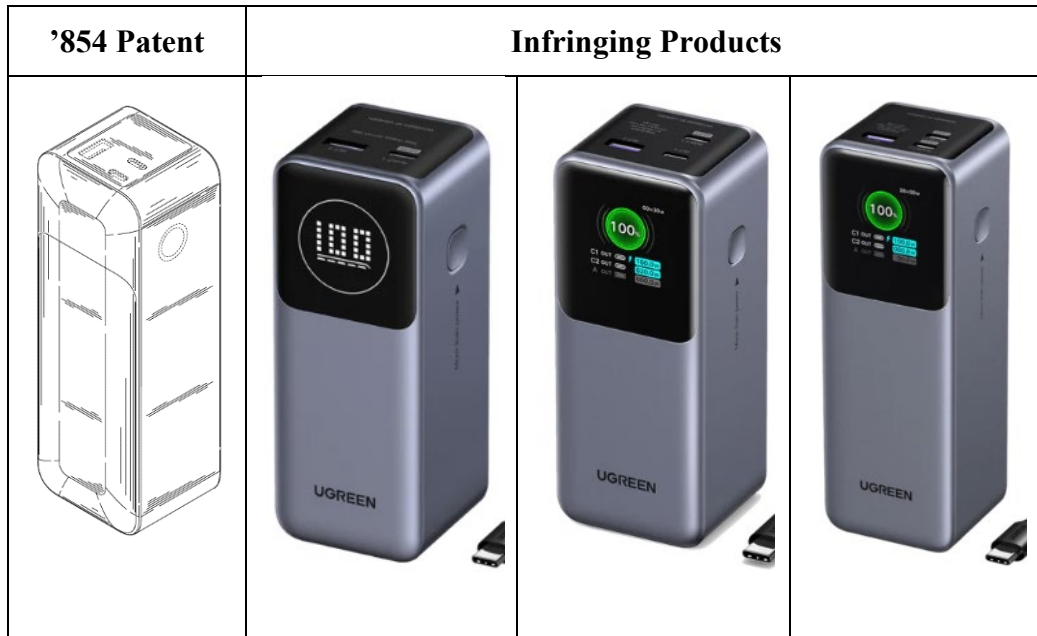
**COMPLAINT FOR PATENT  
INFRINGEMENT  
JURY TRIAL DEMANDED**

Plaintiff Anker Innovations Technology Co., Ltd (“Plaintiff” or “Anker”), by and through its undersigned counsel, brings this action against Defendants America Ugreen Limited, Ugreen Import & Export Co., Ltd., and Ugreen Group Limited (collectively, “Defendants” or “Ugreen”) for infringement of United States Design Patent Number D1,027,854 (“the ’854 Patent”), and in support, alleges as follows:

**NATURE OF THE LAWSUIT**

1. This is an action for patent infringement of United States Design Patent Number D1,027,854 (“the ’854 Patent”), entitled “Mobile Power Bank”, arising under the patent laws of the United States Title 35, United States Code §§ 1 *et seq.* to enjoin further infringement and obtain damages resulting from Ugreen’s unauthorized manufacture, use, importation, offer to sell, and sale in the United States of products identified and described herein in violation of Anker’s rights under the ’854 Patent. Ugreen’s infringing conduct is shown in the images below, displaying the ’854 Patent alongside the virtually identical

products sold by Ugreen:



2. Anker seeks permanent injunctive relief, monetary damages, and other appropriate relief resulting from Ugreen's infringement.

### **JURISDICTION AND VENUE**

3. This action arises under the patent laws of the United States, 35 U.S.C. § 101 *et seq.* This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Ugreen is subject to personal jurisdiction in this district because it regularly conducts and solicits business within the United States and Washington. Moreover, America Ugreen Limited has its principal place of business in this district. On information and belief, America Ugreen Limited imports into, distributes, sells, offers for sale, and/or advertises infringing products in this district. In addition, Ugreen maintains its website [ugreen.com](https://www.ugreen.com), which is available in Washington and facilitates and/or enable users to purchase the infringing products from Washington, and provides its office in Washington as the contact information. *See, e.g.,* <https://www.ugreen.com/pages/contact-us> (last accessed on February 24, 2025). On information and belief, Ugreen Import & Export Co., Ltd. regularly imports products into the United States and Washington. Seattle is one of

its top ports in the United States for importation. *See, e.g.*, <https://www.importgenius.com/suppliers/ugreen-import-export-co-ltd> (last accessed on February 26, 2025). On information and belief, Ugreen advertises, offers for sale, and sells products via at least Amazon.com in this district and the United States. On information and belief, Ugreen, and specifically Ugreen Group Limited, has entered into contacts with customers, including Amazon.com, in this judicial district and consented to jurisdiction in this judicial district. Defendants have caused, and continue to cause, acts of infringement to occur in this district in violation of 35 U.S.C. § 271.

5. Venue is proper as to America Ugreen Limited in this district pursuant to 28 U.S.C. § 1400(b) and 28 U.S.C. § 1391(b) because America Ugreen Limited maintains a regular and established place of business in this district, and imports, offers for sale and sells the accused products in this district, and offers for sale and sells products through its website, which is accessible in Washington. Infringement by America Ugreen Limited has occurred and continues to occur in this district. Venue is proper as to Ugreen Import & Export Co., Ltd., a foreign company, in this district, because it may be sued in any district under 28 U.S.C. § 1391(c)(3). Venue is proper as to Ugreen Group Limited, a foreign company, in this district, because it may be sued in any district under 28 U.S.C. § 1391(c)(3).

### **THE PARTIES**

6. Plaintiff Anker Innovations Technology Co., Ltd. is a corporation organized and existing under the law of People's Republic of China, with its principal address at Room 701, Building 7, Zhongdian Software Park, 39 Jianshan Road, Hi-Tech Zone, Changsha 410000, China.

7. On information and belief, Defendant America Ugreen Limited is a Delaware corporation, that is registered to do business in the state of Washington, with its principal place of business at 10900 NE 8th Street, Suite 610, Bellevue, Washington, 98004, and can be served by serving its registered agent Business Filings Incorporated, at 711 Capitol Way S., Suite 204, Olympia, Washington 98501. The website of Ugreen also shows its location in the United States as 10900 NE 8th St, STE 610, Bellevue, WA 98004. *See, e.g.*,

1 <https://www.ugreen.com/pages/contact-us> (last accessed on February 24, 2025). On  
2 information and belief, America Ugreen Limited a company wholly owned by Ugreen Group  
3 Limited, which is based in Shenzhen, Guangdong, China.

4 8. On information and belief, Defendant Ugreen Import & Export Co., Ltd. is a  
5 company organized under the laws of People's Republic of China, with registered address at  
6 Floor 2, Block 7, Yu'an Zone, Longcheng Industrial Park, Gaofeng Community, Dalang  
7 Street, Longhua District, Shenzhen. On information and belief, Ugreen Import & Export Co.,  
8 Ltd. is a company wholly owned by Ugreen Group Limited, which is based in Shenzhen,  
9 Guangdong, China.

10 9. On information and belief, Defendant Ugreen Group Limited is a company  
11 organized under the laws of People's Republic of China, with registered address at Floors 1-6,  
12 Block 7, and Floor 4, Block 6, Yu'an Zone, Longcheng Industrial Park, Gaofeng Community,  
13 Dalang Street, Longhua District, Shenzhen.

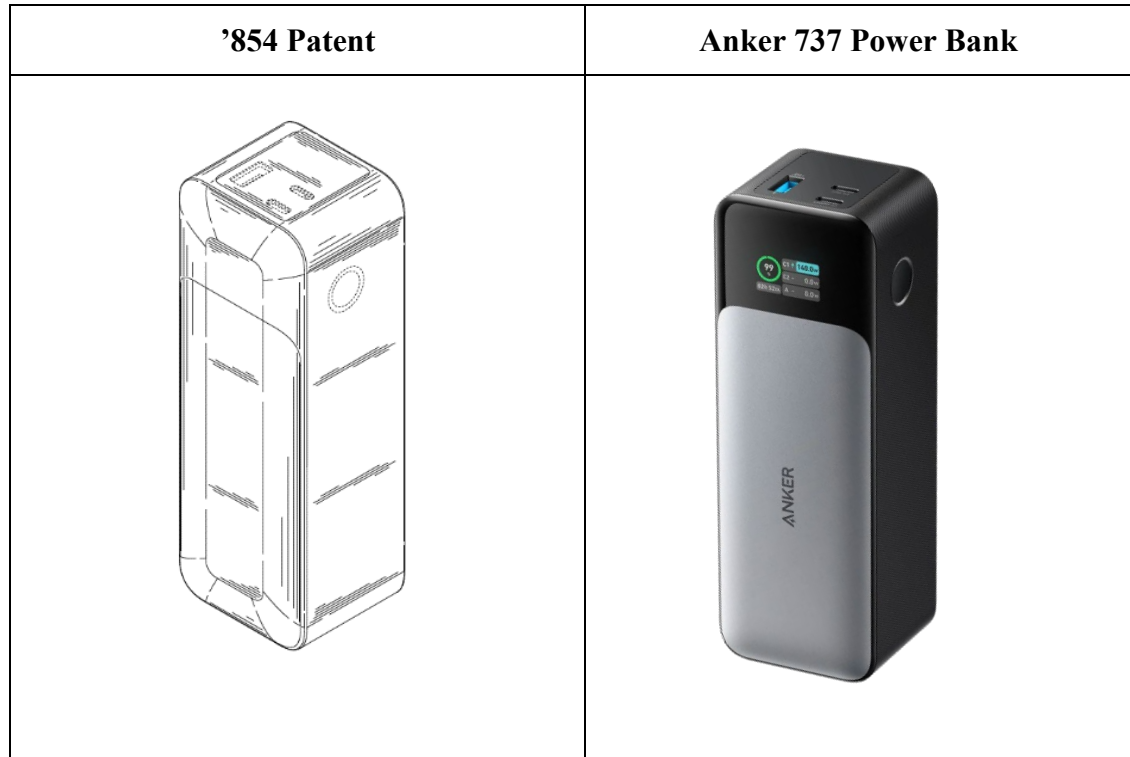
14 10. The Ugreen Defendants are jointly responsible for the acts of infringement  
15 described herein individually and together as one as part of a joint venture, partnership, and/or  
16 common enterprise.

17 **U.S. DESIGN PATENT NO. D1,027,854**

18 11. Anker, one of the world's most popular consumer electronic companies, is an  
19 internationally well-known, award winning, company specializing in electric charging devices  
20 and related products for over ten years. The Anker brand has been in use in commerce in  
21 connection with Anker's electric charging devices and related products since at least as early  
22 as May 1, 2010. Anker offers a wide range of powerful and innovative portable power banks  
23 and portable chargers that will supercharge users' charging experience.

24 12. Anker owns all right, title and interests in, and/or has standing to sue for  
25 infringement of United States Design Patent Number D1,027,854 ("the '854 Patent"), entitled  
26 "Mobile Power Bank", issued May 21, 2024. The '854 Patent claims priority to foreign  
27 application, Chinese Application No. 202230265923.5, which was filed on May 7, 2022. A  
28 copy of the '854 Patent is attached hereto as **Exhibit 1**.

13. The Anker 737 Power Bank embodies the design of the '854 Patent. Upon its introduction in 2022, the Anker 737 Power Bank garnered much attention and praise for its innovative design and functionality as a power bank with intelligent charge monitoring. *See, e.g.,* <https://www.storagereview.com/review/anker-737-power-bank-review> (last accessed on February 24, 2025); <https://gadgetoid.com/2022/11/01/anker-737-power-bank-powercore-24k-review/> (last accessed on February 24, 2025); <https://www.youtube.com/watch?v=WIrLw1fQ3GU> (last accessed on February 24, 2025).



#### **UGREEN AND ITS INFRINGING PRODUCTS**

14. Ugreen is a company that manufactures and distributes consumer electronic devices and accessories. *See, e.g.,* <https://www.ugreen.com/pages/about-ugreen> (last accessed on February 24, 2025).

15. Based on available information, in March 12, 2024, Ugreen began making, using, importing, selling, and/or offering for sale its Ugreen Nexode Power Bank, including, but not limited to, the Nexode Power Bank 12000mAh 100W, the Nexode Power Bank 20000mAh 130W, and the Nexode Power Bank 25000mAh 200W (collectively, the “Nexode Power Banks”).

16. Examples of the Nexode Power Banks marketed, sold, and distributed by Ugreen are shown below.



17. Ugreen offers for sale the Nexode Power Banks on its websites in the United States, advertising them as a power bank with “Smart (Digital) Display.” *See, e.g.*, <https://www.ugreen.com/products/ugreen-nexode-power-bank-12000mah-100w>; <https://www.ugreen.com/products/ugreen-nexode-power-bank-20000mah-130w>; <https://www.ugreen.com/products/ugreen-nexode-power-bank-25000mah-200w-with-smart-digital-display> (last accessed on February 24, 2025). Based on available information, the Nexode Power Banks became available on Amazon.com on March 12, 2024 and continue to be sold on Amazon. *See, e.g.*, <https://www.amazon.com/UGREEN-12000mAh-Charging-Portable-Charger/dp/B0CXJ1F1M7>; <https://www.amazon.com/UGREEN-20000mAh-Portable-Charger-Charging/dp/B0CXHNGDC1>; <https://www.amazon.com/UGREEN-25000mAh-Portable-Charger-Charging/dp/B0CXHM5RY2> (last accessed on February 24, 2025).

18. Attached hereto as **Exhibit 2** is a Claim Chart that illustrates each element of the infringing Nexode Power Bank 12000mAh 100W as to compared to the '854 Patent.

19. Attached hereto as **Exhibit 3** is a Claim Chart that illustrates each element of the infringing Nexode Power Bank 20000mAh 130W as to compared to the '854 Patent.

20. Attached hereto as **Exhibit 4** is a Claim Chart that illustrates each element of the infringing Nexode Power Bank 25000mAh 200W as to compared to the '854 Patent.

21. An ordinary observer of Ugreen's products and Anker's patented design, giving such attention that a consumer electronics purchaser in the relevant price range usually gives, would find the two designs to be substantially the same. The overall impression of the two designs is substantially the same.

22. The '854 Patent is infringed by the Nexode Power Banks because, in the eye of an ordinary observer, they are substantially the same.

23. Third parties have identified the Nexode Power Banks as having a similar design to Anker power bank design, with one reviewer stating that the Nexode Power Bank 25000mAh 200W "looks like a knock off [of] the Anker one." *See, e.g.*, [https://www.amazon.com/gp/customer-reviews/R39WXDPWCH9BQI/ref=cm\\_cr\\_getr\\_d\\_rvw\\_ttl?ie=UTF8&ASIN=B0CXHM5RY2](https://www.amazon.com/gp/customer-reviews/R39WXDPWCH9BQI/ref=cm_cr_getr_d_rvw_ttl?ie=UTF8&ASIN=B0CXHM5RY2) (last accessed on February 24, 2025).

24. Ugreen's infringement is causing and is likely to continue causing irreparable harm to the detriment of Anker until Ugreen's infringement is put to a stop.

### **COUNT I**

#### **INFRINGEMENT OF THE '854 PATENT**

25. Anker repeats, realleges, and incorporates by reference, as if fully set forth herein paragraphs 1 through 24, as set forth above.

26. The '854 Patent, entitled "Mobile power bank" was duly and lawfully issued by the United States Patent and Trademark Office on May 21, 2024.

27. Anker is the owner of the entire right, title, and interest in the '854 Patent and possesses all rights of recovery under the '854 Patent, including the right to recover damages.

28. Ugreen has directly infringed and continues to directly infringe the '854 Patent by the activities referred to in this Complaint in violation of 35 U.S.C. § 271(a).

29. On information and belief, Ugreen has been, and is now directly, infringing the '854 Patent by making, using, selling, and/or offering for sale in the United States and/or



1 importing into the United States the Nexode Power Banks.

2 30. Ugreen's acts of making, using, importing, selling, and/or offering for sale  
3 infringing products and services have been without license, permission, or authorization from  
4 Anker.

5 31. Without limiting the forgoing, Ugreen has infringed at least Claim 1, the only  
6 claim, of the '854 Patent as described in the preliminary claim charts attached hereto as  
7 **Exhibits 2, 3, and 4.**

8 32. Ugreen's infringement includes, but is not limited to, the manufacture, use,  
9 sale, importation and/or offer for sale of Ugreen's products, including its UGREEN branded  
10 Nexode Power Bank 12000mAh 100W, Nexode Power Bank 20000mAh, and Nexode Power  
11 Bank 25000mAh, which incorporate Anker's patent. See **Exhibits 2, 3, and 4.**

12 33. An ordinary observer would think that each of the Nexode Power Banks is  
13 substantially the same as the '854 Patent.

14 34. Based on the foregoing, the Nexode Power Banks infringe the '854 Patent.

15 35. Ugreen will continue to infringe the '854 Patent unless enjoined by this Court.  
16 As a result of the infringing conduct of Ugreen, Anker has suffered, and will continue to suffer  
17 irreparable harm for which there is no adequate remedy at law. Accordingly, Anker is entitled  
18 to permanent injunctive relief against such infringement pursuant to 35 U.S.C. § 283.

19 36. Ugreen has profited from its sales of the Nexode Power Banks.

20 37. Ugreen has profited from its infringement of the '854 Patent.

21 38. Ugreen's infringement of the '854 Patent has injured and continues to injure  
22 Anker in an amount to be proven at trial, but not less than a reasonable royalty.

23 39. On information and belief, Ugreen's infringing products were copied from  
24 Anker's product, covered by the '854 Patent. Upon further information and belief, Ugreen's  
25 infringement of the '854 Patent is willful and deliberate. On information and belief, Ugreen  
26 was placed on notice of the '854 Patent and its infringement thereof no later than in connection  
27 with takedown complaints filed with Amazon in 2024. As a result, Anker is entitled to  
28 trebling of damages pursuant to 35 U.S.C. § 284, and to the designation of this case as



1 exceptional pursuant to 35 U.S.C. § 285, whereby Anker is entitled to an award of its attorney'  
 2 fees.

### 3 **PRAYER FOR RELIEF**

4 WHEREFORE, Anker demands judgment and relief against Defendants America  
 5 Ugreen Limited and Ugreen Group Limited, and respectfully requests that the Court:

- 6 A. An entry of judgement that the '854 Patent was duly and legally issued, is valid,  
 7 enforceable, and has been infringed by Ugreen;
- 8 B. An issuance of a permanent injunction restraining Ugreen, its directors,  
 9 officers, agents, employees, successors, assigns, affiliates, and all persons  
 10 acting in privity, concert, or participation with any of the above from the  
 11 continued infringement of the '854 Patent;
- 12 C. For an accounting and an award of damages sufficient to compensate Anker for  
 13 the infringement in no event less than a reasonable royalty pursuant to 35  
 14 U.S.C. § 284;
- 15 D. A determination that Ugreen's infringement has been willful, wanton, and  
 16 deliberate and that the damages against it be increased up to treble on this basis  
 17 or for any other basis in accordance with the law;
- 18 E. A finding that this case is an exceptional case under 35 U.S.C. § 284 and an  
 19 award to Anker of its costs and reasonable attorneys' fees as provided by 35  
 20 U.S.C. § 285;
- 21 F. An accounting of all infringing sales and revenues, together with post judgment  
 22 interest and prejudgment interest from the first date of infringement of the '854  
 23 Patent; and
- 24 G. That Anker is entitled to such other and further relief as to the Court appears  
 25 just and proper.

### 26 **JURY DEMAND**

27 Under Rule 38 of the Federal Rules of Civil Procedure, Anker hereby demands a trial  
 28 by jury of all issues so triable.

1 Dated: February 28, 2025

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16 *Attorneys for Plaintiff Anker Innovations*  
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